

**IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF OHIO
AKRON DIVISION**

In Re:

SAMUEL WILLIAMS
GLORIA WILLIAMS

Debtor(s)

CASE NO. 19-51307-amk

Chapter 13

Judge Alan M. Koschik

OBJECTION TO CHAPTER 13 PLAN

Creditor, Wilmington Trust, NA, successor trustee to Citibank, N.A., as Trustee f/b/o holders of Structured Asset Mortgage Investments II Inc., Bear Stearns ALT-A Trust 2006-7, Mortgage Pass-Through Certificates, Series 2006-7 (“Creditor”), by and through counsel, hereby objects to the proposed Chapter 13 Plan filed by the Debtor. This Objection is hereby supported by the following Memorandum.

Respectfully Submitted

/s/ Steven H Patterson

Steven H. Patterson (0073452)
Attorney for Creditor
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MEMORANDUM

Creditor holds a Mortgage on the real estate located at 1947 Northgate Circle, Akron, OH 44320. Creditor has not yet filed a Proof of Claim, however anticipates doing so listing an estimated balance of \$255,351.10. Debtor's Plan list mortgage in section 3.3 however it should be listed in section 3.1.

The Chapter 13 Plan as proposed herein does not adequately protect the Creditors' interest in said real estate.

WHEREFORE, Creditor requests that confirmation be denied.

/s/ Steven H Patterson

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CERTIFICATE OF SERVICE

I certify that on June 21, 2019, a true and correct copy of the Objection to Plan was served:

Via the court's Electronic Case Filing System on these entities and individuals who are listed on the court's Electronic Mail Notice List:

Charles Tyler, Sr., Debtor`s Counsel
charles.tyler@tylerlawoffice.com

Keith Rucinski, Bankruptcy Trustee
efilings@ch13akron.com

U.S. Trustee
ustpreion09.cl.ecf@usdoj.gov

And by regular U.S. Mail, postage prepaid on:

Gloria Williams, Debtor
1947 Northgate Circle
Akron, OH 44320-4229

Samuel Williams, Debtor
1947 Northgate Circle
Akron, OH 44320-4229

/s/ Steven H Patterson

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